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February 23, 2010

VIA CM/ECF AND FEDERAL EXPRESS

Honorable Michael A. Shipp, U.S.M.J. United States District Court for the District of New Jersey Martin Luther King, Jr. Federal Building 50 Walnut Street Newark, New Jersey 07101

Re: Walsh Securities, Inc. v. Cristo Property Management, LTD, a/k/a G.J.L Limited., et al. Civil Action No. 97-3496 (DRD/MAS)

Dear Judge Shipp:

We represent Plaintiff Walsh Securities Inc. ("WSI") in this above entitled action. We write to give you a status of the case and to respectfully request that in light of the circumstances all discovery deadlines be extended by ninety (90) days. All parties represented by counsel consent to this request. We do not make this request lightly, and wish to apprise Your Honor of the salient facts underlying it.

A few months ago, the parties agreed that the 30(b)(6) deposition of Robert Walsh – the principal of WSI – would take place first. The parties also were of the mind that Mr. Walsh should not be deposed until Judge Debevoise disposed of Mr. Walsh's motion to dismiss the Third Party Complaint filed against him. Judge Debevoise ultimately dismissed the Third Party Complaint on December 16, 2009.

Unfortunately, Mr. Walsh's deposition has yet to be taken because his wife fell ill with cancer and so he has been unavailable until very recently. This, combined with waiting for the disposition of the motion to dismiss, have caused the delay in the taking of depositions.

As it stands now, the parties anticipate that at least twenty-five depositions will be taken in this matter. We therefore respectfully request that we be given an extra ninety (90) days in which to take fact and expert discovery. In accordance with your Law Clerk's guidance, we are available for a telephone conference at Your Honor's convenience to discuss these matters, either on Wednesday, February 24, 2010, Thursday, February 25, 2010, or at such a later date that Your Honor deems convenient.

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We thank Your Honor for your kind attention to this matter.

Respectfully submitted,

/s Robert A. Magnanini

ee: David Kott (via CM/ECF only)
Edward J, Hayes (via CM/ECF only)
Martin McGowan (via CM/ECF only)
Richard Calanni (via U.S. Mail)
Richard DiBenedetto (via U.S. Mail)